FUNDING OF TITLE V PROGRAMS

Preliminary Results of NACAA 2014 Survey



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New Jersey Department of Environmental Protection

Introduction/Background

- During November 2014, NACAA conducted a survey to examine how agencies are handling fees for major facility program, as required by Title V of the Clean Air Act.
- A detailed analysis of survey results is being done by NACAA, NJDEP, and AMEC (NJDEP's air program consultants).
- Final results will be available in early 2015.
- Selected data and additional details are provided in a separate handout.
- Some of the highlights based on a preliminary review of survey data are presented here.

Highlights from Survey Data

TITLE V PROGRAMS

- 43 state and local air pollution control agencies participated in the survey to date.
- These agencies regulate more than 5,500 Title V facilities.
- Total Program Cost of regulating 5,500 facilities is \$152 million.
 - Average cost of regulating a Title V facility: \$27,436 (state average: lowest \$11,000, highest \$76,000)
 - Average fees (emission+other) per Title V facility: \$26,427 (state average: lowest \$13,000, highest \$118,000)

Highlights from Survey Data

PROGRAM RESOURCES

- Average number of Title V facilities per FTE: 3.6 (lowest 1.4, highest 16)
- About 63% of agencies (27 out of 43) reported sufficient staffing level.
- 11 agencies responded that they do not have sufficient staff.
- 7 of these agencies plan to add staff.
- 5 did not respond.

Highlights from Survey Data

EMISSION FEES

- 51% of the agencies responded that fees are NOT sufficient to fully fund their programs.
- 14 agencies reported sufficient fees to fully fund their programs.
- Ranking of how agencies adjust the emission fees:
 - 1. Annual CPI Adjustment (19)
 - 2. Increase by Rule (16)
 - 3. Increase by Legislative Approval (12)
 - 4. Annual Evaluation based on Cost (11)
 - 5. Other (4)
 - 6. Inventory Stabilization Factor (2)
- 2 agencies (out of 43 responded) currently charge for Greenhouse Gases (GHGs). Hawaii will begin charging fees for GHGs in 2015.